

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In Re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO**

as representative of

THE COMMONWEALTH OF PUERTO RICO

**PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY (“HTA”), *et al***

Debtors.¹

PROMESA Title III

Case No. 17 BK 3283-LTS

Case No. 17 BK 3567-LTS

(Jointly Administered)

**INFORMATIVE MOTION OF DEL VALLE GROUP, S.P. AND MOTION
REQUESTING LEAVE TO ATTEND AND PARTICIPATE IN JULY 24-25, 2019
OMNIBUS HEARING, IF NECESSARY**

TO THE HONORABLE COURT,

COMES NOW creditor Del Valle Group, S.P., represented by the undersigned counsel,
and files this informative motion and respectfully requests leave to attend and participate in the

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA” and together with the Commonwealth, COFINA, HTA, and ERS, the “Debtors”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

July 24-25, 2019 Omnibus Hearing pursuant to *Order Regarding Procedures for Attendance, Participation and Observation of July 24-25, 2019 Omnibus Hearing* (Docket No. 7963).

Del Valle Group, S.P requests leave for Michael Craig McCall, of the Law Offices of Michael Craig McCall, to appear and present argument, if necessary, on behalf of the Del Valle Group, S.P at the July 24-25, 2019 Omnibus Hearing in the San Juan Courtroom, in reference to agenda item, the Forty-Sixth Omnibus Objection (Non-Substantive) of the Puerto Rico Highways and Transportation Authority and Employees Retirement System of the Government of the Commonwealth of Puerto Rico (the “Forty-Sixth Omnibus Objection”) (Docket No. 7269); Del Valle Group, S.P.’s Response and Reservation of Rights in Response to the Forty-Sixth Omnibus Objection (Docket No. 7864); and the Reply of the Puerto Rico Highways and Transportation Authority and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to the Response filed by Claimant Del Valle Group, S.P. to the Forty-Sixth Omnibus Objection (Docket No. 8073).

The Del Valle Group, S.P is presently in discussions with counsel for the Financial Oversight and Management Board for Puerto Rico to see if the parties can reach agreement which would make unnecessary the need for an appearance by the Del Valle Group, S.P at the July 24-25, 2019 Omnibus Hearing.

While the undersigned counsel had inadvertently calendared today, July 19, 2019, as the deadline for filing the informative motion referenced in the *Order Regarding Procedures for Attendance, Participation and Observation of July 24-25, 2019 Omnibus Hearing* (Docket No. 7963), in reviewing such Order again this morning, the undersigned realized that the Informative Motion should have been filed by the close of business yesterday, July 18, 2019, thus the Del

Valle Group, S.P. respectfully requests the Court to grant it leave for its undersigned counsel to attend and participate in the July 24-25, 2019 Omnibus Hearing.

No prejudice will be caused by allowing the Del Valle Group, S.P. to appear through counsel and participate in the July 24-25, 2019 Omnibus Hearing and allowing such appearance is necessary for the Del Valle Group, S.P. to be able to fully assert its rights and interests in relation to the claim it has filed in this proceeding and the matters raised in its Response and Reservation of Rights in Response to the Forty-Sixth Omnibus Objection, in the event that it is unable to reach agreement with the Financial Oversight and Management Board for Puerto Rico in advance of such Omnibus Hearing making unnecessary its need to appear.

Counsel for the Del Valle Group, S.P. has conferred today with counsel for the Financial Oversight and Management Board for Puerto Rico who stated that they have no objection to the Court granting leave for the Del Valle Group, S.P. to appear through counsel and participate in the July 24-25, 2019 Omnibus Hearing in the event that the parties are unable to reach agreement in advance of such Omnibus Hearing making unnecessary such appearance.

WHEREFORE, the Del Valle Group, S.P., requests that the Court be informed of everything stated above, and that for the reasons stated above, the Court grant leave for counsel Michael Craig McCall to attend and participate in the July 24-25, 2019 Omnibus Hearing on behalf of the Del Valle Group, S.P. in reference to agenda item, the Forty-Sixth Omnibus Objection (Non-Substantive) (Docket No. 7269); and the other above-referenced filings in relation to the same, (Docket Nos. 7864 and 8073) in the event that the Del Valle Group, S.P. is unable to reach agreement with the Financial Oversight and Management Board for Puerto Rico in advance of such Omnibus Hearing making unnecessary its need to appear at such Omnibus Hearing.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this same date, a true and exact copy of this Notice of Appearance has been filed with the Clerk of the Court using the CM-ECF system which will send notification of such filing to the Court, and to all parties or counsels of record at their registered e-mail addresses within the CM/ECF system.

Respectfully submitted in San Juan, Puerto Rico, this 19th day of July, 2019.

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